

IN THE DISTRICT COURT OF MARYLAND FOR PRINCE GEORGE'S COUNTY

KAMILIA HARDEN  
3407 13<sup>th</sup> Place, SE  
Washington, DC 20032

:

:

Plaintiffs

:

vs.

:

Civil No.:

NICHELLE RICARDA  
6604 Woodstream Drive  
Lanham, Maryland 20706

:

:

Defendant

:

**COMPLAINT**

**COME NOW** the Plaintiff, Kamilia Harden, by and through her attorney, **MARVIN LISS**, and sues the Defendant, Nichelle Ricarda, and for causes of action states:

**COUNT I**  
**(NEGLIGENCE)**

1. That on or about November 3, 2021 at approximately 4:15 pm, the Plaintiff, Kamilia Harden, while exercising due care for her own safety, was operating a motor vehicle along Alabama Avenue, SE in Washington, DC.

2. That at the same time and place aforementioned, the Defendant, NICHELLE RICARDA, was operating a motor vehicle along Alabama Avenue, SE in Washington, DC.

3. That at the same time and place aforementioned, it became the duty of said Defendant to operate her motor vehicle in a safe and prudent manner, to maintain a constant vigilance for all other vehicles around her and ahead of her, to pay full time and attention; to maintain control of her vehicle; to travel at appropriate speeds; to observe all traffic devices and to observe all the traffic laws, rules and regulations of the District of Columbia.

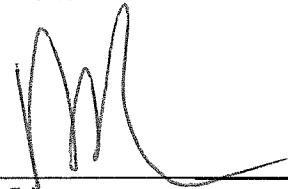
4. That notwithstanding the aforementioned duties, said Defendant failed in the performance thereof, and negligently and recklessly caused her motor vehicle to violently strike the Plaintiff's vehicle in the rear.

5. That as a direct and proximate result of the negligent acts of said Defendant, the Plaintiff sustained severe personal injuries to, including, but not limited to, her chest, neck, head, back, shoulders and shock to her central nervous system(s).

6. That as a direct and proximate result of said Defendant's negligence, the Plaintiff has incurred, and will continue to incur, substantial expenses for medical care and attention.

7. That as a direct and proximate result of said Defendant's negligence, Plaintiff has incurred a loss of salary and/or wage.

**WHEREFORE**, the Plaintiff, Kamilia Harden, claims of the Defendant, NICHELLE RICARDA, damages in the amount of Thirty Thousand and 00/100 dollars (\$30,000.00) plus interest and costs of suit herein.



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Attorney for Plaintiff

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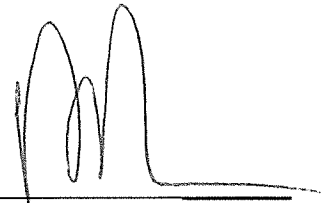
Defendant

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**CERTIFICATION**

TO THE CLERK OF THE COURT:

Undersigned Counsel hereby certifies that he is admitted to practice law before the Court of Appeals for the State of Maryland and that he is in good standing. Counsel is licensed to practice law in the State of Maryland.



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